UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

Cr. No. 19-10080-NMG

GREGORY COLBURN, et al.,

Defendants.

DEFENDANT JOHN WILSON'S MOTION TO CONTINUE SENTENCING DATE

Defendant John Wilson moves that the Court continue his sentencing date from February 17, 2022 to any of the following dates: March 3, 4, 7, 8, 21, 25, 30 or 31. As grounds for this motion Wilson states:

- Martha Victoria is the U.S. Probation Officer assigned to Wilson's case. She has a
 longstanding vacation scheduled for February 17-25, 2022. Wilson understands she
 has served as the probation officer for all or virtually all of the Varsity Blues cases.

 She has interviewed Wilson, conducted a home visit to his residence, and conducted
 numerous other steps that are part of the standard sentencing process. Thus, she has a
 deep understanding of the relevant issues.
- 2. Wilson believes the Court and both parties would be best served if Ms. Victoria can attend the hearing. A supervisor or another probation officer "filling in" will not have the same depth of experience with the issues in this case.
- 3. The government recently sent Probation and Wilson's counsel documents advocating for a guideline enhancement. Wilson is preparing an opposition to this position. Ms.

Victoria has informed Wilson's counsel that she is available to participate in a March

Motion denied but the Court will entertain the re-scheduling of the sentencing to any date before Thurs., Feb 17, 2022.

MMGoston, USDJ 12/30/2021